

May 15, 2009

Ms. Shannon Downey
Environmental Engineer
Air Enforcement and Compliance Assurance Branch
US Environmental Protection Agency Region 5 AE-17J
77 W. Jackson Blvd
Chicago, Illinois 60604

Dear Ms. Shannon Downey

Re: VIM Recycling, Inc, Elkhart Indiana

Brief History of VIM Recycling, Inc.

VIM Recycling, Inc. was incorporated on November 5, 1990, so we have over eighteen years of recycling experience in the State of Indiana. VIM has two primary shareholders, Mr. McCarthy and me. We are not part of any holding company and I am the only owner that works in the company day to day. The main objective of the company is to find alternative uses and secondary markets for industrial solid waste in northern Indiana that is currently being landfilled.

Our original plant and headquarters are located in Elkhart County at 64654 U.S. 33 East, Goshen, Indiana. We currently have 56,040 square feet of plant capacity at our Goshen facility. Our second facility, a 33 acre complex in Elkhart, Indiana has two buildings for indoor wood grinding and material storage. The two Elkhart buildings have a combined 72,000 square feet of indoor space. Our third facility is in Argos, Indiana. This 11 acre facility serves as VIM's natural bark mulch yard. VIM leads the way in northern Indiana for indoor facilities when comparing VIM to its competitors. We employed over 45 associates (excluding owners) before the fire in June 2007 and plan to run the same or more once fully operational.

As mentioned above, our stated goals and objectives are to find alternative uses and secondary markets for industrial solid waste in northern Indiana. Our goals and objectives are divided into two categories.

- ❑ Our 1st objective is to meet the needs of manufacturers in northern Indiana by providing a "full service" recycling program for the materials which make up the industrial solid waste stream here, with particular focus on recreational and modular home manufacturers. Recyclable materials that VIM handles include gypsum wallboard (drywall) and wood waste products.

Now, eighteen years later, we are in a strong position to lead the field and dominate the northern Indiana industrial solid waste processing and selling of secondary materials.

- ❑ Our second stated objective is to market and sell VIM processed materials that are of consistent top quality, competitively priced, and readily available. Secondary materials that are marketed by VIM are as follows:
 - ◆ Wood Products: Wood is ground up to be used primarily for animal bedding, landscape mulch, biomass wood fuel, and organic compost.
 - ◆ Gypsum Wallboard (Drywall): Recycled wallboard is shredded, milled and screened leaving the gypsum to be marketed for use in agriculture applications, insulation and cement industries. The current demand in the secondary market exceeds the availability in the solid waste stream.

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Resolution to VIM's "C" pile problem:

In 2008, VIM has reduced inventory of wood products by more than 10,000 tons. We have shipped 10,000 more tons than we brought in. In 2007, we reduced inventory by more than 4,000 tons. By Monday morning we will have the first four months of 2009 results.

For the "C" pile material that has not been screened and ground up as of this date we propose the following solution:

1. VIM to be allowed to screen and grind the remainder of the "C" pile. The minus 2" screened material would be piled and stored to be used in high carbon compost program. The plus 2" material coming off the screener would be ground and sold as "Road Bed Material" (RBM) at Earthmovers and Prairieview Landfills owned by Waste Management. We have sold over 6,000 tons during the 1st four months of 2009 from our other sites and are scheduled to run out of RBM in May 2009.
2. VIM to be allowed to screen and grind the remainder of the "C" pile. The minus 2" screened material would be piled and stored to be used in high carbon compost. The plus 2" material coming off the screener would be ground and transported to the Elkhart County Landfill's environmental center and windrowed with the support of the Commissioners of Elkhart County in conjunction with leave recycling and Soil Solutions programs (VIM). We have talked with the Commissioners and they are willing to help VIM and would talk with EPA on assistance that they can provide to resolve this situation at VIM.
3. VIM to be allowed to screen and grind the remainder of the "C" pile. The minus 2" screened material would be piled and stored to be used in high carbon compost. The plus 2" material coming off the screener would be ground and windrowed at VIM's Elkhart site and sold by Soil Solutions as carbon compost.

The screening process will eliminate the aerobic activity in the "C" pile. The proposed time line for screening and grinding the "C" pile would be from six months to one and a half years from the time permission was granted. This would allow for any contingencies for equipment breakdowns and weather conditions that would effect daily production .

Thank you for your time on this matter. You can reach me at the number or email below at anytime.

Sincerely,

Ken Will
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